

# Illinois Commerce Commission

## Pipeline Safety

### Pipeline Safety Report

**Inspection #: 2014-P-00456**

Operator: NRG Wholesale Generation LP	Operator ID#: 31999
Exit Meeting Contact: Gil Smith	Total Man Days: 3
Pipeline Safety Representative(s): Aaron McElravy	
Company Representative to Receive Report: Gil Smith	<b>Emailed Date:</b>
Company Representative's Email Address: gil.smith@nrgenergy.com	11/18/2014

#### Inspection Summary

Inspection Type	Location	ICC Analyst	Inspection Unit(s)	Man Day(s)	Inspection Date(s)	Contact(s)
Standard Inspection Plan Review- O and M	Neoga	Aaron McElravy	NRG Wholesale Generation LP	3	10/28/2014, 10/29/2014, 10/30/2014	Gil Smith

#### Statement of Activities

On October 28-30, 2014, Staff conducted an Operations and Maintenance Manual ("O&M") Plan review to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590. Staff reviewed NRG Wholesale Generation LP's written procedures for the transmission pipeline to ensure safety during normal operations and maintenance activities and for emergency response. Staff identified five deficiencies listed below associated with the review. Additional information regarding this audit can be obtained from the applicable checklist.

#### Exit Statement

### **INSPECTION FINDINGS**

#### **Standard Inspection Plan Review- O and M**

##### **Issues(s) Found:**

[NO ISSUES FOUND]

##### **Notice Of Amendment(s) Found:**

**2014-A001-00128** (Code Part [192.13(c)][192.505(c)]) - The O&M does not contain the minimum 8 hour strength test duration for pipelines operating above 30% SMYS.

**2014-A001-00129** (Code Part [192.13(c)][192.325(a)]) - The O&M does not contain procedures for addressing underground clearance requirements associated with other underground structures in proximity of the pipeline. Sufficient clearance of underground structures must be maintained to allow for maintenance on the pipeline. If clearance requirements cannot be met additional measures must be taken to protect the pipeline.

**2014-A001-00130** (Code Part [IL ADM. CO.265.100(b)]) - The O&M does not contain procedures for reporting third party damage to the transmission main if a release occurs to ICC JULIE Enforcement.

**2014-A001-00131** (Code Part [192.13(c)][192.505(e)]) - The O&M does not contain the minimum 4 hour strength test for fabricated units or short sections of pipe in which post installation tests are impractical. This exception is allowed under

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192.505(c). If this minimum requirement is not used, procedures would need to detail the minimum requirements for testing of these facilities.

**2014-A001-00132** (Code Part [192.13(c)][192.327(a)]) - The O&M does not contain procedures detailing the minimum cover requirements for transmission pipelines in accordance with 192.327(a). Procedures must include the minimum cover requirements by location and soil conditions.

**Notice Of Violation(s) Found:**

[NO NOPVS FOUND]

### **PAST INSPECTION FINDINGS**

**Issue(s) Corrected:**

[NO ISSUES CORRECTED]

**Notice Of Amendment(s) Corrected:**

[NO NOAS CORRECTED]

**Notice of Violations(s) Corrected:**

[NO NOPVS CORRECTED]